Alan Alexander Beck
Law Office of Alan Beck
2692 Harcourt Drive
San Diego, CA 92123
(619) 905-9105
Hawaii Bar No. 9145
Alan.alexander.beck@gmail.com

Stephen D. Stamboulieh Stamboulieh Law, PLLC P.O. Box 4008 Madison, MS 39130 (601) 852-3440 stephen@sdslaw.us MS Bar No. 102784 *Admitted Pro Hac Vice

Attorneys for Plaintiffs
ANDREW TETER & JAMES GRELL

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF HAWAII

TODD YUKUTAKE and DAVID)
KIKUKAWA)
)
Plaintiffs,)
) Civil Action No. 19-578 (JMS-RT)
v.)
)
CLARE E. CONNORS, in her) DECLARATION OF COUNSEL
Official Capacity as the Attorney)
General of the State of Hawaii)
and the CITY and COUNTY)
OF HONOLULU) TRIAL: January 12, 2021 9AM
) JUDGE: Hon. J. Michael Seabright
) HEARING DATE: N/A
Defendants.)
)

DECLARATION OF STEPHEN D. STAMBOULIEH

- I, Stephen D. Stamboulieh, declare as follows:
- 1. I am an attorney with the law firm of Stamboulieh Law, PLLC, counsel for Plaintiffs in the above-captioned action. I am admitted *pro hac vice* in this matter.
- 2. I am authorized and competent to testify to the matters contained in this declaration, and unless otherwise indicated, I make this declaration based upon personal knowledge.
- 3. I am an attorney licensed to practice in all state and federal courts in Mississippi; the Northern District of Texas; Southern District of Texas; Washington, D.C. District Court; Second, Third, Fourth, Fifth, Sixth, Ninth & District of Columbia Circuit Courts of Appeals; United States Court of Federal Claims; Northern District of New York; and the United States Supreme Court. I am a member in good standing of all the aforementioned courts.
- 4. Attached hereto as Exhibit "A" is a true and accurate copy of selected portions of Defendant's Responses to Plaintiffs' Interrogatories.
- 5. Attached hereto as Exhibit "B" is a true and accurate copy of selected portions of SB2954.
- 6. Attached hereto as Exhibit "C" is a true and accurate copy of selected portions of Defendant's Responses to Plaintiffs' Request for Production of Documents.

- 7. Attached hereto as Exhibit "D" is a true and accurate copy of selected portions of Defendant's Responses to Plaintiffs' Request for Admissions.
- 8. Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Dated: Canton, Mississippi, July 20, 2020.

Respectfully submitted,

Counsel for Plaintiffs

/s/ Stephen D. Stamboulieh Stephen D. Stamboulieh Stamboulieh Law, PLLC *Admitted Pro Hac Vice